

PROGRESSIVE BROADCASTING SYSTEM, INC.
and
CHRISTIAN FRIENDS BROADCASTING, INC.
Elkhart, Indiana

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: MM Docket No. 99-25
Further Notice of Proposed Rule Making

Dear Ms. Dortch:

This is in response to the Commission's Second Order on Reconsideration and Further Notice of Proposed Rule Making in MM Docket No. 99-25 (released March 17, 2005), concerning the possibility of affording low power FM stations a priority over FM translators in the use of FM spectrum. Progressive Broadcasting System, Inc. is the licensee of FM Broadcast Stations WFRN-FM, Elkhart, Indiana; and WFRI, Winnamac, Indiana. Christian Radio Friends, Inc. is the licensee of FM Broadcast Station WFRR, Walton, Indiana. While these stations serve their cities of license their signal is difficult to receive due to the intervening terrain in numerous portions of their service area. As a result, the only way many people can receive the stations' signal is via a translator.

Progressive has filed applications for new translators to serve areas where intervening terrain prevents reception of a listenable signal within the service area of its stations. The translator applications, which was filed over two years ago, are still pending at the Commission. These translators are desperately needed to provide a listenable signal to the residents of the stations' service areas. The Commission's proposal to possibly dismiss these applications is clearly not in the public interest. Not only would such dismissals significantly damage Progressive, which has expended tens of thousands of dollars prosecuting these applications on the representation of the Commission that the applications would be accepted and considered in due course, but it would deprive listeners within the primary coverage area of the Progressive stations their only means by which they can receive a listenable signal.

Translators do not simply rebroadcast another station. Translators generally rebroadcast local stations that listeners depend upon. They provide a genuine service by allowing people to hear nearby radio stations when, in many cases, their communities have no stations or only a few stations of their own. Translators need to be protected just as their primary station service areas are protected. There simply is no basis for LPFM stations to get priority status over translators.

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Especially, in rural areas, translators often provide the only means by which a primary station can serve its complete coverage area.

Dated this 22nd day of August, 2005.

Very truly yours,

**PROGRESSIVE BROADCASTING
SYSTEM, INC.
and
CHRISTIAN FRIENDS
BROADCASTING, INC.**

By: Edwin C. Moore / ECM
Edwin C. Moore, President